

DOCKET FILE COPY ORIGINAL

**Before the
Federal Communications Commission
Washington, D. C.**

RECEIVED

OCT - 2 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Federal-State Joint Board on)
Universal Service)
)
Forward-Looking Mechanism)
for High Support for)
Non-Rural LECs)

CC Docket No. 96-45

CC Docket No. 97-160

To: Deputy Chief, Common Carrier Bureau

**Motion for Extension of Time
and Modification of
Data Response Requirement**

North State Telephone Company (North State), by its attorneys and pursuant to Section 1.46 of the Commission's Rules, hereby requests an extension of time within which to file responses to the data requests made by the Common Carrier Bureau on August 7, 1998¹. In addition, North State requests permission to use the alternative billing period of October 1998 as source data for reporting certain revenue information.

Request for Extension of Time

North State is among the sixteen local exchange carriers, including five RBOCs, GTE and United Telephone System, required to compile and produce specified revenue data. North State is the second smallest of the sixteen listed

¹ See In the Matter of Federal-State Joint Board on Universal Service and Forward-Looking Mechanism for High Support for Non-Rural LECs, DA 98-1576 (August 7, 1998).

No. of Copies rec'd 024
List A B C D E

local exchange carriers². Each of the sixteen local exchange carriers is required to provide historical cost data, as well as end-user stratified and dollar stratified data reports. Despite diligent effort, North State finds that it is unable to compile and produce this information by the October 6, 1998 deadline due to software and staff limitations.

North State, which serves a single study area, does not have the billing and reporting capability to perform a special study as quickly as requested by the Bureau. Significant reprogramming is required to compile the data and produce the report in the format required by the Commission. As a result, North State faces a significantly greater burden in complying with the data request than the 250 hours estimated by the Bureau. In addition, North State's technical staff is also concurrently engaged in Year 2000 efforts, thus creating an additional burden on limited resources. Accordingly, North State's reasonable efforts notwithstanding, the October 6, 1998 deadline cannot be met in an efficient, cost effective manner. North State therefore requests an extension of time through December 7, 1998 to provide all of the information requested by the Bureau.

Request for Use of Alternative Billing Period

The Commission's reporting requirements for Charts 4 and 5 include an analysis of an entire month's billings, and further separation of data in those billings by total bill amount. The Commission has specified that the data should be

² United States Telephone Association, *Phone Facts 1997*, "Largest Telephone Companies Reporting to USTA" (1998).

for the month of July 1998. North State requests that it be permitted to use the similarly representative period of October 1998 to promote the efficiencies which will result from combining standard billing and data compilation.

North State proposes that the special study to complete Charts 4 and 5 be performed in conjunction with October's standard billing. Inasmuch as the same North State staff members who will conduct the special study also are responsible for standard billing, significant efficiencies will result from utilization of current data. In order to conduct the study utilizing July, 1998 data, North State staff would be required to re-input an entire month of historical data and billing for all end users after software reprogramming. If current (October 1998) data were used instead, the input of billing and reporting data would occur concurrently. The cost and time savings would be significant and would promote efficient compliance with the Bureau's data request.

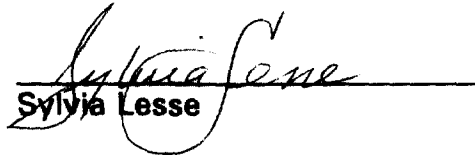
The substitution of October 1998 data will not compromise the representative nature of the data. Both October and July are months consisting of 31 days, and both contain a federal holiday (Independence Day and Columbus Day, respectively). Furthermore, North State will charge identical access rates in both months. Permitting North State to use October 1998 revenue data instead of July 1998 data will not skew any reports submitted to the Commission and will provide the Commission with adequate data for use in developing models based upon non-rural local exchange usage. Accordingly, North State respectfully requests that it be permitted to use an October 1998 reporting period.

Wherefore, good cause having been shown, North State requests that the Commission a) extend the North State data submission deadline in the captioned proceeding to December 7, 1998; and, b) permit North State to use October 1998 as its reporting period for Charts 4 and 5.

Respectfully submitted,

NORTH STATE TELEPHONE COMPANY

By:


Sylvia Lesse

Its Attorney

Kraskin, Lesse & Cosson, LLP
2120 L Street, N.W.
Suite 520
Washington, D.C. 20037
(202) 296-8890

October 2, 1998

CERTIFICATE OF SERVICE

I, Shelley Bryce, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC, 20037, hereby certify that on this 2nd day of October, 1998, a copy of the foregoing "Motion for Extension of Time and Modification of Data Response Requirements" was hand delivered to the parties listed below:


Shelley Bryce

James D. Schlichting
Deputy Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW
Room 500
Washington, DC 20054

Katie King *
Accounts and Policy Division
Common Carrier Bureau
Federal Communications Commission
2100 M Street, NW
Room 8601
Washington, DC 20054

*** Via hand delivery and facsimile**